

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.	
v.	:	DATE FILED:	
PHILIP KEVIN LYONS	:	VIOLATIONS:	
	:	18 U.S.C. § 371 (conspiracy to commit	
	:	armed bank robbery - 1 count)	
	:	18 U.S.C. § 2113(d) (armed bank robbery	
	:	- 2 counts)	
	:	18 U.S.C. § 924(c) (carrying a firearm	
	:	during a crime of violence - 2 counts)	
	:	18 U.S.C. § 2	
	:	(aiding and abetting)	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. On or about November 26, 2003, in Whitehall Township, Pennsylvania, in the Eastern District of Pennsylvania, defendant

PHILIP KEVIN LYONS

conspired and agreed, together with Richard Michael Bundra II, charged elsewhere, to commit an offense against the United States, that is, to knowingly and unlawfully commit armed bank robbery of the Sovereign Bank, located at 1240 Third Street in Whitehall, Pennsylvania, the deposits of which were insured by the Federal Deposit Insurance Corporation, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that defendant PHILIP KEVIN LYONS and Richard Michael Bundra II committed an armed robbery of the Sovereign Bank, located at 1240 Third Street in Whitehall, Pennsylvania, at gunpoint and stole approximately \$21,446.

OVERT ACTS

In furtherance of the conspiracy, the defendant committed the following overt acts in the Eastern District of Pennsylvania:

On or about November 26, 2003:

1. Defendant PHILIP KEVIN LYONS and Richard Michael Bundra II drove together in a 1985 Cadillac El Dorado to the Sovereign Bank ("the bank"), located at 1240 Third Street in Whitehall, Pennsylvania, for the purpose of committing an armed bank robbery.

2. After defendant PHILIP KEVIN LYONS and Richard Michael Bundra II entered the bank, defendant LYONS vaulted over the teller counter and stole money from bank teller drawers, while Richard Michael Bundra II waived a .38 caliber revolver at the bank employees and customers and told them to put their hands up.

3. Defendant PHILIP KEVIN LYONS and Richard Michael Bundra II fled from the bank and drove away in a Cadillac El Dorado with approximately \$21,416 in U.S. currency stolen from the bank.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 26, 2003, in Whitehall Township, Pennsylvania, in the Eastern District of Pennsylvania, defendant

PHILIP KEVIN LYONS

knowingly and unlawfully, by force and violence, and by intimidation, took and aided and abetted the taking, from employees of the Sovereign Bank, located at 1240 Third Street in Whitehall Township, Pennsylvania, lawful currency of the United States, that is, approximately \$21,416 belonging to, and in the care, custody, control, management and possession of Sovereign Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant LYONS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of Sovereign Bank, and other persons, by use of a dangerous weapon, that is, a .38 cal. revolver.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about November 26, 2003, in Whitehall Township, Pennsylvania, in the Eastern District of Pennsylvania, defendant

PHILIP KEVIN LYONS

knowingly carried and aided and abetted the carrying of a firearm, that is, a black .38 cal. revolver, during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, that is, armed bank robbery of the Sovereign Bank, located at 1240 Third Street in Whitehall Township, Pennsylvania, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2004, in Easton, Pennsylvania, in the Eastern District of Pennsylvania, defendant

PHILIP KEVIN LYONS

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of the Lafayette Ambassador Bank, located at 1800 Butler Street in Easton, Pennsylvania, lawful currency of the United States, that is, approximately \$6,320 belonging to, and in the care, custody, control, management and possession of Lafayette Ambassador Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant LYONS knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Lafayette Ambassador Bank, and other persons, by use of a dangerous weapon, that is, a .38 cal. revolver.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2004, at Easton, Pennsylvania, in the Eastern District of Pennsylvania, defendant

PHILIP KEVIN LYONS

knowingly carried a firearm, that is, a black .38 cal. revolver, during and in relation to a crime of violence for which he may be prosecuted in a Court of the United States, that is, armed bank robbery of the Lafayette Ambassador Bank, located at 1800 Butler Street in Easton, Pennsylvania, in violation of Title 18, United States Code, Section 2113(d).

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney